



U.S. Department of Justice

*Office of the United States Trustee
Eastern District of New York
Brooklyn Division*

*271 Cadman Plaza East, Suite 4529
Brooklyn, New York 11201
Telephone Number 718-422-4960
Facsimile Number 718-422-4990*

June 26, 2012

Via ECF and Facsimile

Honorable Elizabeth S. Stong
United States Bankruptcy Judge
271 Cadman Plaza East
Brooklyn, NY 11201

Re: OTR Media Group, Inc., Case No. 11-47385 (ESS)

Dear Judge Stong:

On June 5, 2012, the United States Trustee filed an objection (the "Objection") to the fee applications (the "Applications") of various professionals retained by OTR Media Group, Inc. (the "Debtor") pursuant to this Court's Order Authorizing the Debtor to Employ Professionals Utilized in the Ordinary Course of Business (the "OCP Order"). ECF No. 165. The Objection alleged that the Applications sought fees in excess of the monthly caps established in the OCP Order. Id. On June 29, 2012, the Debtor filed a Reply to the Objection. ECF No. 182. A hearing on the matter is scheduled for June 29, 2012 at 10:30 a.m. (the "June 29th Hearing").

Subsequent to the filing of the Objection, Cohen Hochman & Allen ("CHA"), as special counsel to the Debtor, filed an application, pursuant to the OCP Order, seeking \$19,200.00 in compensation. ECF No. 172. The monthly cap for CHA is \$5,000.00. ECF No. 165.

Accordingly, for the reasons outline in the Objection, the United States Trustee respectfully objects to the application of CHA, and requests that the Court enforce the terms of the OCP Order and limit fees paid to CHA to \$5,000.00. The remaining fees can be sought by fee application. The United States Trustee reserves all rights to raise any objections with respect to CHA's compensation and reimbursement of expenses sought in any future interim or final fee applications.

Honorable Elizabeth S. Stong
June 26, 2012
Page 2 of 2

The United States Trustee requests that the Court consider this matter, in conjunction with the other Applications, at the June 29th Hearing.

Very truly yours,

TRACY HOPE DAVIS
UNITED STATES TRUSTEE

By: /s/ William E. Curtin
William E. Curtin
Trial Attorney

cc: Gary M. Kushner, Esq. (via E-Mail)